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Iowa League of Cities Comments on Smart Planning Draft Recommendations

The League of Cities would like to make the following comments on the Smart Planning Task Force's (hereinafter Task Force) 9/15/2010 draft recommendations.

1. (Recommendations 3.2, 3.3,3.6) The League supports giving cities more funding options and incentives and grants to cities to help encourage smart planning and aid in its implementation. These recommendations recognize the reality that many Iowa cities may face difficulties in financing smart planning and implementation, especially while struggling to prioritize a myriad of other important budget issues. Incentives could help cities by giving a needed push to get them started with smart planning or to update their existing plans. Funding for actually creating the plan by working with consultants or Councils of Governments (COGs), and executing and enforcing the plan are both important components of funding and incentives suggested in the draft.
2. (Recommendations 1, 1.3 , 1.4 , 1.5) These recommendations suggest establishing a framework to coordinate Smart Planning in the state. The League understands one of the legislative charges to the Task Force was to, "Develop a model for regional comprehensive planning within the state and recommend partnerships between state agencies, local governments, educational institutions, and research facilities." In the draft recommendations, a great deal of focus has been put on regional planning at the COG level. The draft recommends state that the COGs should serve as the "geographic entities" for regional smart planning, and states that smart planning should be **mandatory** at the regional level.

When focus and funding are stressed at the COG level, the reality of limited local and state resources comes to bear. It seems unlikely the legislature would authorize additional funding mechanisms or incentives for all levels of planning suggested in the recommendations (State OPGIS, COGs, Local Governments and DNR-based Watershed Plans). COGs do not currently have funding available to do comprehensive plans. If COGs have mandated planning, but no new funding mechanism, member cities of COGs would have to foot the bill for this unfunded mandate, through increased COG dues. This could be particularly difficult, if cities are expected to do local smart plans and also fund a regional plan. Encouraging cities, especially smaller cities, and or counties to work together to create plans could be another option to lessen costs and encourage a regional look at planning.

It is unclear how COGs would carry out several suggested recommendations that would have an effect on local governments, and how interaction between the COGs and local governments would occur. The level of staffing and expertise varies in COGs across the state, just as cities vary greatly in their own levels of sophistication, from not having a comprehensive plan, to having a city planner on staff. The interaction between different COGs and cities will be dependent upon specific circumstances of each. It is unclear how COGs would implement the integration of watershed plans into the regional planning process. COGs do not have staffing expertise in this

area. The recommendation requiring COGs to review city plans and offer non-binding comments, will also depend on staffing levels and expertise. Timing of how and when this process is supposed to occur is unclear and could become burdensome to cities, if not done in a streamlined fashion. Similarly, a clear process for letters of qualification has not been devised. Cities may have to be able to get a timely response from their COG in order to meet grant or program application deadlines.

Finally, some cities have expressed concern at recommendation 1.5, which suggests a new COG be formed in central Iowa, the so called “donut hole” without an existing COG. The cities in the region have evolved sophisticated ways of accomplishing planning without a COG through Metropolitan Planning Organizations, and some have extensive planning processes underway now. They view their efforts as being far ahead of what a newly formed COG could accomplish or at least duplicative of a COG.

3. (Recommendation 3.7) The League strongly supports Smart Planning educational efforts, which will be important to increase knowledge and understanding of the smart planning principles and how they can benefit communities. The League has already begun taking the lead, with the League Executive Board’s support, in educational efforts to create a smart planning education program for local government staff and officials, and has begun to work closely with ISU Extension in developing a curriculum and determining which ways to present the information to the intended audience. A challenge will be for the over 52% of Iowa’s cities with populations of 500 or less, to understand the benefits of planning for cities that may not be experiencing high rates of growth. Educational programs for planners and for future planners in the state should also be developed and highlighted.
4. (Recommendation 3.5) While smart investment of public dollars should always be a goal, state agencies implementing recommendation 3.5, that state agencies should “set a threshold or give additional consideration for having a qualified smart plan” should be tempered with the realities cities face in leveraging funds, and meeting requirements at the state and federal levels. For example, some cities are under consent decrees with the EPA to correct water infrastructure issues within a certain timeframe. Cities may have to prioritize funding for these types of projects, and may not have a plan in place. At a minimum, cities should get a timeframe within which to complete a smart plan, even if they do not have one at the time of application. Not every program will lend itself to these types of evaluations, and a one-size fits all approach may not be the best solution. The legislature chose not to make smart planning mandatory, and connecting every state dollar to having a smart plan could be a de facto mandate on some communities.
5. (Recommendations 3.8, 3.9) The League supports the accessible availability of GIS and other data, and the creation of a smart planning toolbox to help cities implement smart planning.

(Recommendation 4) Watershed planning and coordination are an important component of comprehensive planning for cities, but cities cannot affect the watershed alone. Flooding is not

created just within the boundaries of cities or counties; It is cross-jurisdictional; It is urban and rural. The watershed as a whole must be evaluated. During the passage of the initial Smart Planning legislation, the legislature was focused on disaster mitigation, particularly flooding and avoiding flood damage through proper planning. Although COGs are one option for regional planning, watersheds could also serve as the “geographic entities” for regional planning. The Iowa Flood Center is producing mapping and tools that within the next few years, will be able to help communities predict flood risk and see how additional flood mitigation measures (such as a new levy) can affect their communities and those downstream. Connecting smart plans to this type of data seems to logically address what the legislature was aiming to accomplish with the Smart Planning legislation; however, there are not currently permanent watershed governmental entities in the State that would easily lend themselves to serving in this capacity. A state-level assessment of where existing watershed resources are invested, what public and private programs are working or could be strengthened, and a serious look at how to achieve stronger cross-jurisdictional watershed planning is needed. The League supports efforts to better coordinate watershed planning and to continue funding for tools and information, and suggests adding a recommendation to continue funding for the Iowa Flood Center and for the DNR, to continue valuable flood plain programs.